

Kim D. Cannon, WY Bar No. 5-1401
Cole L. Gustafson, WY Bar No. 7-6070
DAVIS & CANNON LLP
40 South Main Street
P. O. Box 728
Sheridan, WY 82801
Telephone: (307) 672-7491
Facsimile: (307) 672-8955
cannon@davisandcannon.com
cole@davisandcannon.com

Michael P. Hatley (admitted *pro hac vice*)
McNAUL EBEL NAWROT & HELGREN PLLC
600 University Street, Suite 2700
Seattle, WA 98101
Telephone: (206) 467-1816
Facsimile: (206) 624-5128
mhatley@mcnaul.com

Attorneys for Plaintiff

John W. Graham
Geittmann Larson Swift LLP
East Pearl Street, Suite 200
P.O. Box 1226
Jackson, WY 83001
Telephone: (307) 733-3923
Facsimile: (307) 733-3947
jwg@glslip.com

Yoni Rosenzweig
Admitted Pro Hac Vice
Davis Wright Tremaine LLP
868 South Figueroa Street, Suite 2400
Los Angeles, CA 90017
Telephone: (213) 633-6800
Facsimile: (213) 633-6899
yonirosenzweig@dwt.com

Raphael Holoszyk-Pimentel
Admitted Pro Hac Vice
Davis Wright Tremaine LLP
1251 Avenue of the Americas, 21st Floor
New York, NY 10020
Telephone: (212) 489-8230
Facsimile: (212) 489-8340
rhp@dwt.com

Attorneys for Defendant Blockchain Game Partners, Inc.

JOINT MOTION TO PROVISIONALLY SEAL
EXHIBITS TO COMPLAINT - 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

DRIFTER ENTERTAINMENT, INC., a Delaware corporation, <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> BLOCKCHAIN GAME PARTNERS, INC. d/b/a GALA GAMES, a Wyoming corporation, <p style="text-align: center;">Defendant.</p>	Civil Action No. 1:23-cv-00187
---	--------------------------------

JOINT MOTION TO PROVISIONALLY SEAL EXHIBITS TO COMPLAINT

Pursuant to Local Civil Rule 5.1(g), Plaintiff Drifter Entertainment, Inc. (“Drifter”) and Defendant Blockchain Game Partners, Inc. d/b/a Gala Games (“Gala”), through their respective counsel, hereby jointly move the Court to enter their stipulated proposed order provisionally sealing the exhibits attached to Drifter’s complaint (Dkt. No. 6).

Drifter commenced this lawsuit on October 10, 2023 by filing its complaint (Dkt. No. 6) alleging (among other things) that Gala breached certain contracts (“Contracts”) with Drifter. Drifter attached copies of these contracts to its complaint as Exhibits 1 and 2 (Dkt. Nos. 6-1 and 6-2).

On November 13, 2023, Gala filed counterclaims (Dkt. No. 17) alleging (among other things) that the Contracts required that the terms be kept confidential, and that there was no legal requirement to attach the Contracts in their entirety to the publicly filed complaint at this stage of the litigation. Gala requested that the Court strike or seal Exhibits 1 and 2 to the complaint.

Drifter does not concede any of the allegations in Gala's counterclaims, nor does it agree that the Contracts are entitled to sealing under the applicable Tenth Circuit standard for sealing judicial records. Gala does not waive any of its claims or damages related to its claim of breach of the confidentiality clause or any other provision of the Contracts.

Nevertheless, out of an abundance of caution and to avoid or limit any potential harm to Gala, Drifter and Gala have agreed to file this joint motion, while reserving the right to present these issues to the Court at a later date.

Accordingly, the parties respectfully request that the Court enter their stipulated proposed order provisionally sealing Exhibits 1 and 2 to the Complaint (Dkt. Nos. 6-1 and 6-2).

[Signatures on Next Page]

Respectfully submitted this 16th day of November, 2023.

By: /s/ Kim D. Cannon

Kim D. Cannon, WY Bar No. 5-1401
Cole L. Gustafson, WY Bar No. 7-6070
Davis and Cannon, LLP
40 South Main Street
P.O. Box 728
Sheridan, WY 82801
Telephone: (307) 672-7491
Facsimile: (307) 672-8955
cannon@davisandcannon.com
cole@davisandcannon.com

Michael P. Hatley
Admitted Pro Hac Vice
McNaul Ebel Nawrot & Helgren PLLC
600 University Street, Suite 2700
Seattle, WA 98101
Telephone: (206) 467-1816
Facsimile: (206) 624-5128
mhatley@mcnaul.com

*Attorneys for Plaintiff Drifter
Entertainment, Inc.*

By: /s/ Raphael Holoszyk-Pimentel

John W. Graham
Geittmann Larson Swift LLP
East Pearl Street, Suite 200
P.O. Box 1226
Jackson, WY 83001
Telephone: (307) 733-3923
Facsimile: (307) 733-3947
jwg@glsllp.com

Yoni Rosenzweig
Admitted Pro Hac Vice
Davis Wright Tremain LLP
868 South Figueroa Street, Suite 2400
Los Angeles, CA 90017
Telephone: (213) 633-6800
Facsimile: (213) 633-6899
yonirosenzweig@dwt.com

Raphael Holoszyk-Pimentel
Admitted Pro Hac Vice
Davis Wright Tremain LLP
1251 Avenue of the Americas, 21st Floor
New York, NY 10020
Telephone: (212) 489-8230
Facsimile: (212) 489-8340
rhp@dwt.com

*Attorneys for Defendant Blockchain Game
Partners, Inc.*

Certificate of Service

I certify that a true and correct copy of the foregoing document was served on counsel of record via the Court's CM/ECF system on this 16th day of November, 2023.

/s/ Kim D. Cannon

Kim D. Cannon

Cole L. Gustafson

cannon@davisandcannon.com

cole@davisandcannon.com